



March 31, 2016

National Spray Can Filling Corp  
c/o New Jersey Department of Treasury  
P. O. Box 002  
Trenton, NJ 08625-0002

**REGISTERED MAIL  
RETURN RECEIPT REQUESTED  
& FEDERAL EXPRESS**

**RE:** Notice of Intent to Pursue Federal Civil Action

Dear Sir or Madam:

We are attorneys for 641-653 Dowd LLC (c/o Palin Enterprises), the owner of the property at 641 Dowd Avenue in the Elizabeth, County of Union, and State of New Jersey ("Property").

The discharge(s), release(s), spill(s) or disposal (together the "Disposal") of materials, including PCE, TCE, vinyl chloride, 1,1-dichloroethene, 1,1-dichloroethane, cis-1,2-dichloroethene, and 1,1,1-trichloroethane and/or other waste materials (the "Waste Materials") and other hazardous substances at the Property, during the period of operation of the Property by Contact Industries and/or Safeguard Chemical Corporation, has resulted in environmental contamination to the soil (the "Contamination"). The Contamination and Disposal have caused an imminent and substantial endangerment to health or the environment at the Property.

Please take notice, pursuant to Resource Conservation and Recovery Act §7002(a)(1)(B), 42 U.S.C. §6972(a)(1)(B), that our client intends to bring a civil action against you, as the operator of the Property at the time of the Disposal, which was a treatment, storage, or disposal facility, due to handling, storage, treatment, transportation, and/or disposal of solid or hazardous waste, which may present an imminent and substantial endangerment to health or the environment, ninety (90) days after the date of this notice. In such an action, you may be required to pay costs of litigation (including reasonable attorney and expert witness fees), and will be subject to the power of the court to order you to take such other action as may be necessary to respond to or abate such endangerment.

In addition, discharges of pollutants to waters of the United States and/or the waters of the State of New Jersey occurred during the period of operation of the Property by Contact Industries and/or Safeguard Chemical Corporation. These discharges have resulted in contamination of groundwater at the Property. No permit is or was in place to allow for the discharge of pollutants to the groundwater on the Property. These discharges are either still occurring at the present time or are likely to reoccur in the future. As a result, you are and continue to be in violation of the Clean Water Act.



Addressee  
March 31, 2016  
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Please take notice, pursuant to Clean Water Act §505(a)(1), 33 U.S.C. §1365(a)(1), that our client intends to bring a civil action for the violations of the Clean Water Act and described in this notice sixty (60) days after the date of this notice. In such an action, you may be required to pay penalties and costs of litigation (including reasonable attorney and expert witness fees), and will be subject to the power of the Court to award an injunction requiring you to cease and desist illegal discharges and remediate the pollution you have caused.

To avoid the aforementioned litigation, please contact our office regarding the work required to remediate the Property. Thank you.

Sincerely,

**KNAUF SHAW LLP**

A handwritten signature in black ink, appearing to read "Linda R. Shaw".

LINDA R. SHAW

pc: EPA Administrator Gina McCarthy (By Certified Mail)  
NJDEP Commissioner Bob Martin (By Certified Mail)  
EPA Region 2 Administrator Judith Enck (By Certified Mail)  
Dennis Smith, Esq.  
John Westerhold, Esq.



March 31, 2016

Anahid Piranian  
43 Rockwood Road  
Plan Dome, New York 11030

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Please take notice, pursuant to Resource Conservation and Recovery Act §7002(a)(1)(B), 42 U.S.C. §6972(a)(1)(B), that our client intends to bring a civil action against you as the Executrix of the Estate of Poozant (a/k/a Peter) Piranian, as the operator of the Property at the time of the Disposal, which was a treatment, storage, or disposal facility, due to handling, storage, treatment, transportation, and/or disposal of solid or hazardous waste, which may present an imminent and substantial endangerment to health or the environment, ninety (90) days after the date of this notice. In such an action, you may be required to pay costs of litigation (including reasonable attorney and expert witness fees), and will be subject to the power of the court to order you to take such other action as may be necessary to respond to or abate such endangerment.

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